

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
v.) No. 3:10-00260-10
) JUDGE HAYNES
YASIN AHMED FARAH (10))

MOTION TO EXCUSE YASIN AHMED FARAH (10) PRESENCE AT THE
DEPOSITION OF ABDULLAH FARAH a/k/a GRAY GOOSE

Haynes
Turnahan
as filed 8/20/12
Bo
9/6/12

Comes now the Defendant, Yasin Ahmed Farah, by and through his undersigned counsel, R.N. "Bo" Taylor, and hereby moves this Honorable Court to excuse Defendant Yasin Ahmed Farah presence at the deposition of Abdullah Farah a/k/a Gray Goose, scheduled for Wednesday, September 12, 2012, beginning at 1:00 p.m. (See D.E. 2723.)

As grounds for this motion, counsel would show that he will be present at the deposition and will protect the rights of Defendant. Yasin Ahmed Farah is on pre-trial release and resides in Minneapolis, Minnesota. Additionally, Mr. Farah is enrolled in college. It is anticipated the deponent, Abdullah Farah, will refuse to testify. Requiring Defendant Yasin Ahmed Farah to be present will create an undue hardship and create unnecessary expenses under these circumstances.

For the foregoing reasons, it is respectfully requested that the presence of Defendant Yasin Ahmed Farah be excused. Undersigned counsel will be present and represent the Defendant at the deposition.